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April 22, 2024

**VIA ECF**

The Honorable Kevin P. Castel  
United States District Court Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Perkins v. The New York Times Company d/b/a The New York Times  
Case No. 1:22-cv-05202 (PKC)

Dear Judge Castel:

Pursuant to Paragraph 3(A) of the Court's Individual Practices, Plaintiff Megan Perkins ("Plaintiff") respectfully submits this Pre-Motion Letter in anticipation of moving to stay the deadlines for the case as described in ECF No. 45 by thirty days due to a scheduled mediation. The next Case Management Conference is scheduled for May 3, 2024.

Currently, the parties are scheduled to have a half day mediation with Marc E. Isserles of JAMS New York on April 25, 2024 at 10 am Eastern Standard Time. Both parties are attending this mediation to negotiate a potential resolution of this matter in good faith and have had a pre-mediation call with the mediator. Currently, Plaintiff's Motion for Class Certification is due on or before April 25, 2024 and pre-letter motions regarding Motions for Summary Judgment are due by May 2, 2024. Expert discovery concludes in June.

Plaintiff would request a thirty day stay of all current deadlines in ECF No. 45 to give the parties appropriate time to prepare for mediation, attend mediation, and effectuate any settlement agreement details thereafter should a settlement be reached by the parties. The Defendant does not object to the proposed stay request detailed herein.

Respectfully submitted,

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*Counsel for Plaintiffs and the Proposed Class*

*Motion for Class  
Certification and pre-motion  
letters regarding  
summary judgment are  
extended until  
June 6, 2024.  
SO ORDERED  
[Signature]  
USDJ  
4-24-24*